

**FILED**  
U.S. DISTRICT COURT  
EASTERN DISTRICT ARKANSAS

APR 25 2017

JAMES W. McCORMACK, CLERK  
By:  DEP CLERK

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
WESTERN DIVISION**

**UNITED STATES OF AMERICA ,**

**Plaintiff**

**vs.**

**UNITED PAIN CARE, LTD.  
d/b/a UNITED PHARMACY and  
MAHMOOD AHMAD, M.D.**

**Defendants**

**Case No. 4:15CV-181-JM**

**MAHMOOD AHMAD, M.D.**

**INTERROGATORIES**

**INTERROGATORY NO. A-1**

Do you find from a preponderance of the evidence that defendant **Dr. Mahmood Ahmad** dispensed, delivered, or otherwise disposed of controlled substances?

YES \_\_\_\_\_

NO ✓

4/25/17  
DATE

\_\_\_\_\_  
FOREPERSON

If you answered “no” to this Interrogatory, you are done with this set of Interrogatories and do not need to answer the remaining Interrogatories in this set and you can proceed to Interrogatory No. UPC-1.

If you answered “yes” to this Interrogatory, proceed to answer all of the remaining interrogatories.

**INTERROGATORY NO. A-2**

Do you find from a preponderance of the evidence that defendant **Dr. Mahmood Ahmad** refused or negligently failed to maintain an accurate DEA-222 Order Form for Schedule II controlled substances (U.S. Exhibit 11) as required by law?

YES \_\_\_\_\_

NO \_\_\_\_\_

\_\_\_\_\_  
DATE

\_\_\_\_\_  
FOREPERSON

**INTERROGATORY NO. A-3**

Do you find from a preponderance of the evidence that defendant **Dr. Mahmood Ahmad** refused or negligently failed to maintain or keep one DEA-222 Order Form (U.S. Exhibit 12) documenting receipt of Schedule II controlled substances as required by law?

YES \_\_\_\_\_

NO \_\_\_\_\_

\_\_\_\_\_  
DATE

\_\_\_\_\_  
FOREPERSON

**INTERROGATORY NO. A-4**

Do you find from a preponderance of the evidence that defendant **Dr. Mahmood Ahmad** refused or negligently failed to maintain or keep one DEA-222 Order Form (U.S. Exhibit 13) documenting receipt of Schedule II controlled substances as required by law?

YES \_\_\_\_\_

NO \_\_\_\_\_

\_\_\_\_\_  
DATE

\_\_\_\_\_  
FOREPERSON

**INTERROGATORY NO. A-5**

Do you find from a preponderance of the evidence that defendant **Dr. Mahmood Ahmad** refused or negligently failed to maintain accurate dispensing and receiving records for controlled substances (U.S. Exhibit 8) as required by law?

YES \_\_\_\_\_

NO \_\_\_\_\_

\_\_\_\_\_  
DATE

\_\_\_\_\_  
FOREPERSON

**INTERROGATORY NO. A-6**

If you answered “yes” to Interrogatory No. A-5, indicate on the chart below for which controlled substance there was a failure to maintain accurate records:

| <b>Controlled Substance</b> | <b>Properly maintained records</b> | <b>Failure to properly maintain records</b> |
|-----------------------------|------------------------------------|---|
| Alprazolam .5mg             |                                    |   |
| Alprazolam 2 mg             |                                    |   |
| Oxycodone 10mg/650          |                                    |   |
| Hydrocodone 10 mg/650       |                                    |   |
| Hydrocodone 7.5 mg/500      |                                    |   |
| Hydrocodone 5 mg/500        |                                    |   |
| Buprenorphine 8 mg          |                                    |   |
| Lyrica 75 mg                |                                    |   |
| Carisoprodal 350 mg         |                                    |   |
| Lorazepam 2 mg              |                                    |   |

\_\_\_\_\_  
DATE

\_\_\_\_\_  
FOREPERSON

**INTERROGATORY NO. A-7**

Do you find from a preponderance of the evidence that defendant **Dr. Mahmood Ahmad** refused or negligently failed to properly annotate any invoices (U.S. Exhibit 14) for controlled substances as required by law?

YES \_\_\_\_\_

NO \_\_\_\_\_

\_\_\_\_\_  
DATE

\_\_\_\_\_  
FOREPERSON



**INTERROGATORY NO. A-8**

If you answered "yes" to Interrogatory No. A-7, indicate by check mark below which invoices you find were not properly annotated:

| <b>Claim No.</b> | <b>Company</b>      | <b>Date</b> | <b>Invoice Number</b> | <b>Not Properly Annotated</b> |
|------------------|---------------------|-------------|-----------------------|-------------------------------|
| 14               | Cardinal Health     | 02/07/2012  | 6718790               |                               |
| 15               | Cardinal Health     | 02/06/2012  | 6712839               |                               |
| 16               | Cardinal Health     | 02/03/2012  | 6709014               |                               |
| 17               | East End Pharmacy   | --          | --                    |                               |
| 18               | East End Pharmacy   | 03/16/2012  | --                    |                               |
| 19               | East End Pharmacy   | --          | --                    |                               |
| 20               | American Specialty  | 04/11/2013  | 1202                  |                               |
| 21               | Shane Green (email) | 03/14/2012  | --                    |                               |
| 22               | SAJ Distributors    | 07/11/2012  | 872014                |                               |
| 23               | SAJ Distributors    | 07/10/2012  | 871668                |                               |
| 24               | SAJ Distributors    | 07/10/2012  | 871766                |                               |
| 25               | SAJ Distributors    | 07/10/2012  | 871628                |                               |
| 26               | SAJ Distributors    | 07/09/2012  | 871475                |                               |
| 27               | SAJ Distributors    | 07/09/2012  | 871386                |                               |
| 28               | SAJ Distributors    | 07/06/2012  | 870846                |                               |
| 29               | SAJ Distributors    | 07/05/2012  | 870137                |                               |
| 30               | SAJ Distributors    | 08/07/2012  | 879156                |                               |
| 31               | SAJ Distributors    | 08/07/2012  | 879389                |                               |
| 32               | SAJ Distributors    | 08/07/2012  | 879178                |                               |
| 33               | SAJ Distributors    | 08/03/2012  | 878557                |                               |
| 34               | SAJ Distributors    | 08/03/2012  | 878453                |                               |
| 35               | SAJ Distributors    | 08/03/2012  | 878679                |                               |
| 36               | SAJ Distributors    | 08/02/2012  | 878138                |                               |
| 37               | SAJ Distributors    | 08/01/2012  | 877785                |                               |
| 38               | SAJ Distributors    | 07/30/2012  | 877117                |                               |
| 39               | SAJ Distributors    | 07/16/2012  | 873510                |                               |
| 40               | SAJ Distributors    | 07/12/2012  | 872452                |                               |
| 41               | SAJ Distributors    | 08/13/2012  | 880814                |                               |
| 42               | SAJ Distributors    | 08/13/2012  | 880600                |                               |
| 43               | SAJ Distributors    | 08/10/2012  | 880290                |                               |
| 44               | SAJ Distributors    | 08/09/2012  | 879813                |                               |
| 45               | SAJ Distributors    | 08/09/2012  | 879982                |                               |
| 46               | SAJ Distributors    | 08/15/2012  | 881268                |                               |
| 47               | SAJ Distributors    | 08/14/2012  | 881122                |                               |
| 48               | SAJ Distributors    | 08/14/2012  | 881050                |                               |

|    |                  |            |        |  |
|----|------------------|------------|--------|--|
| 49 | SAJ Distributors | 08/14/2012 | 881182 |  |
| 50 | SAJ Distributors | 08/14/2012 | 881017 |  |
| 51 | SAJ Distributors | 08/13/2012 | 880569 |  |
| 52 | SAJ Distributors | 09/06/2012 | 887086 |  |
| 53 | SAJ Distributors | 09/05/2012 | 886600 |  |
| 54 | SAJ Distributors | 09/04/2012 | 886205 |  |
| 55 | SAJ Distributors | 09/04/2012 | 886433 |  |
| 56 | SAJ Distributors | 08/22/2012 | 882910 |  |
| 57 | SAJ Distributors | 08/21/2012 | 882550 |  |
| 58 | SAJ Distributors | 08/20/2012 | 882470 |  |
| 59 | SAJ Distributors | 09/14/2012 | 889346 |  |
| 60 | SAJ Distributors | 09/14/2012 | 889253 |  |
| 61 | SAJ Distributors | 09/14/2012 | 889223 |  |
| 62 | SAJ Distributors | 09/13/2012 | 888920 |  |
| 63 | SAJ Distributors | 09/12/2012 | 888678 |  |
| 64 | SAJ Distributors | 09/12/2012 | 888325 |  |
| 65 | Gen-Source       | 04/12/2013 | 335811 |  |
| 66 | Gen-Source       | 04/11/2013 | 335372 |  |
| 67 | Gen-Source       | 04/05/2013 | 334673 |  |
| 68 | Gen-Source       | 04/03/2013 | 334257 |  |
| 69 | Gen-Source       | 04/02/2013 | 333970 |  |
| 70 | Gen-Source       | 03/29/2013 | 333506 |  |
| 71 | Gen-Source       | 03/25/2013 | 332721 |  |
| 72 | Gen-Source       | 03/19/2013 | 331785 |  |
| 73 | Gen-Source       | 03/14/2013 | 331310 |  |
| 74 | Gen-Source       | 03/13/2013 | 331024 |  |
| 75 | Gen-Source       | 03/12/2013 | 330903 |  |
| 76 | Gen-Source       | 03/08/2013 | 330407 |  |
| 77 | Gen-Source       | 03/08/2013 | 330450 |  |
| 78 | Gen-Source       | 03/07/2013 | 330291 |  |
| 79 | Gen-Source       | 03/06/2013 | 329998 |  |
| 80 | Gen-Source       | 03/01/2013 | 329405 |  |
| 81 | Gen-Source       | 02/28/2013 | 329153 |  |
| 82 | Gen-Source       | 02/26/2013 | 328798 |  |
| 83 | Gen-Source       | 02/22/2013 | 328379 |  |
| 84 | Gen-Source       | 02/19/2013 | 327929 |  |
| 85 | Gen-Source       | 02/12/2013 | 326942 |  |
| 86 | Gen-Source       | 02/08/2013 | 326539 |  |
| 87 | Gen-Source       | 02/06/2013 | 326233 |  |
| 88 | Gen-Source       | 02/01/2013 | 325480 |  |
| 89 | Gen-Source       | 01/30/2013 | 325213 |  |
| 90 | Gen-Source       | 01/23/2013 | 324076 |  |
| 91 | Gen-Source       | 01/21/2013 | 323736 |  |
| 92 | Gen-Source       | 01/16/2013 | 323228 |  |
| 93 | Gen-Source       | 02/14/2013 | 327401 |  |

|     |            |            |        |  |
|-----|------------|------------|--------|--|
| 94  | Gen-Source | 01/11/2013 | 322602 |  |
| 95  | Gen-Source | 01/07/2013 | 321758 |  |
| 96  | Gen-Source | 02/10/2013 | --     |  |
| 97  | Gen-Source | 12/28/2012 | 320831 |  |
| 98  | Gen-Source | 12/18/2012 | 319600 |  |
| 99  | Gen-Source | 12/07/2012 | 318169 |  |
| 100 | Gen-Source | 12/03/2012 | 317140 |  |
| 101 | Gen-Source | 11/15/2012 | 314982 |  |
| 102 | Gen-Source | 11/13/2012 | 314635 |  |
| 103 | Gen-Source | 11/12/2012 | 314407 |  |
| 104 | Gen-Source | 11/07/2012 | 313997 |  |
| 105 | Gen-Source | 11/05/2012 | 313488 |  |
| 106 | Gen-Source | 10/18/2012 | 312246 |  |
| 107 | Gen-Source | 10/12/2012 | 311402 |  |
| 108 | Gen-Source | 10/10/2012 | 311049 |  |
| 109 | Gen-Source | 10/09/2012 | 310878 |  |
| 110 | Gen-Source | 10/08/2012 | 310685 |  |
| 111 | Gen-Source | 10/03/2012 | 310170 |  |
| 112 | Gen-Source | 10/03/2012 | 310139 |  |
| 113 | Gen-Source | 10/02/2012 | 309917 |  |
| 114 | Gen-Source | 09/27/2012 | 309256 |  |
| 115 | Gen-Source | 09/20/2012 | 308432 |  |